

## Appendix A

### Permit Selection Process

#### Overview

Currently, EPA is the permitting authority for **2846** facilities in Region 10, of which **60** facilities are on tribal land. These facilities are located in the four Region 10 States: **2376** in Alaska (**6** on tribal land), **387** in Idaho (**8** on tribal land), **4** in Oregon (**4** on tribal land), and **79** in Washington (**42** on tribal land). Facilities requiring NPDES permits may either be covered under individual or general permits. All facilities are further categorized as either being “major” or “minor.”

#### Permit Backlog

The Permit backlog consists of facilities that have expired permits or have never been issued a permit. EPA Headquarters has a National Goal to have 90% of all NPDES permits to be current. There is also a subset of the NPDES backlog permits that are considered priority permits. In order for a facility’s permit to be considered a Priority permit, the permit must be expired for more than two years or a new application must be on file for more than two years. Priority permits also have environmental significance. The criterion for determining the environmental significance of a permit is one of the following: National Program Priority (CAFO or CSO), significant changes to facilities operations, discharge to drinking water resources, revised effluent limitation guidelines (ELGs), revised water quality standards, protection of endangered species, Environmental Justice issues, discharge to impaired waterbodies, and any other criteria determined by the permitting authority. The States of Alaska and Idaho have not been authorized to administer the NPDES programs; therefore, EPA is solely responsible for the entire backlog of permits within those States. Since the States of Oregon and Washington have been authorized to administer the NPDES program, EPA is responsible for oversight, the backlog of facilities on tribal land in Washington and Oregon, and federal facilities in Washington.

There are currently **605** backlogged facilities in Region 10, **485** facilities (**18** on tribal land) that have expired permits and **120** facilities (**26** on tribal land) that are unpermitted. Figures A-1 through A-6 visually depicts the backlog concerns and also forecasts the backlog with the implementation of this Unit plan.

#### Permit Selection Process

The permit workload needs to be balanced with the resources available to NPU to meet permitting goals. Since there are more facilities in the permit backlog than resources to issue permits to them, the purpose of this plan is to select

permits based on prioritizing those facilities. The steps taken to prioritize permits in the selection process include:

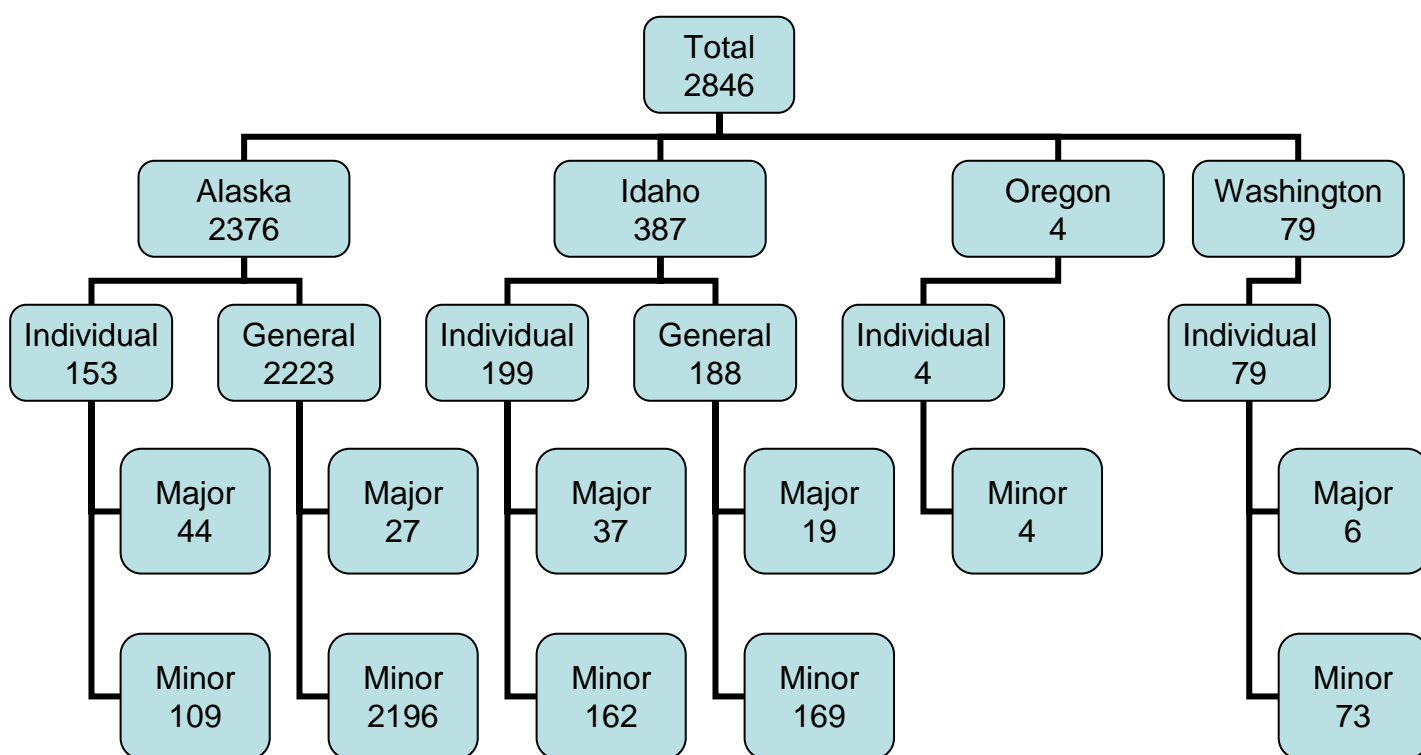
1. Creating a spreadsheet of facilities under Region 10 authority that needs permits (expired, expiring between 2006-2008, never been permitted, new sources)
2. Identifying priority criteria (HQ, Regional, Office of Water and Watershed Priorities)
3. Identifying general permit opportunities
4. Creating a priority workload list
5. Requesting Tribal input
6. Conducting Stakeholder review.

In order to organize the permit prioritizing efforts for Region 10, a spreadsheet was developed that included all facilities within Region 10 that have expired or will expire by 2008, never been permitted, or new sources for which EPA is the permitting authority. Each facility was entered into the spreadsheet, and fields were established for criteria considered important to the prioritization effort. These fields included: *backlog reduction, Coeur d’Alene, Columbia Basin, Existing Assignment, Federal Facility, General Permit, Major, Mining, Minor, Never Been Permitted, New discharge, New source, Oil, Gas, and Timber, Priority Permit, Potential Priority Permit, Puget Sound, TMDL Implementation, and Tribal.*

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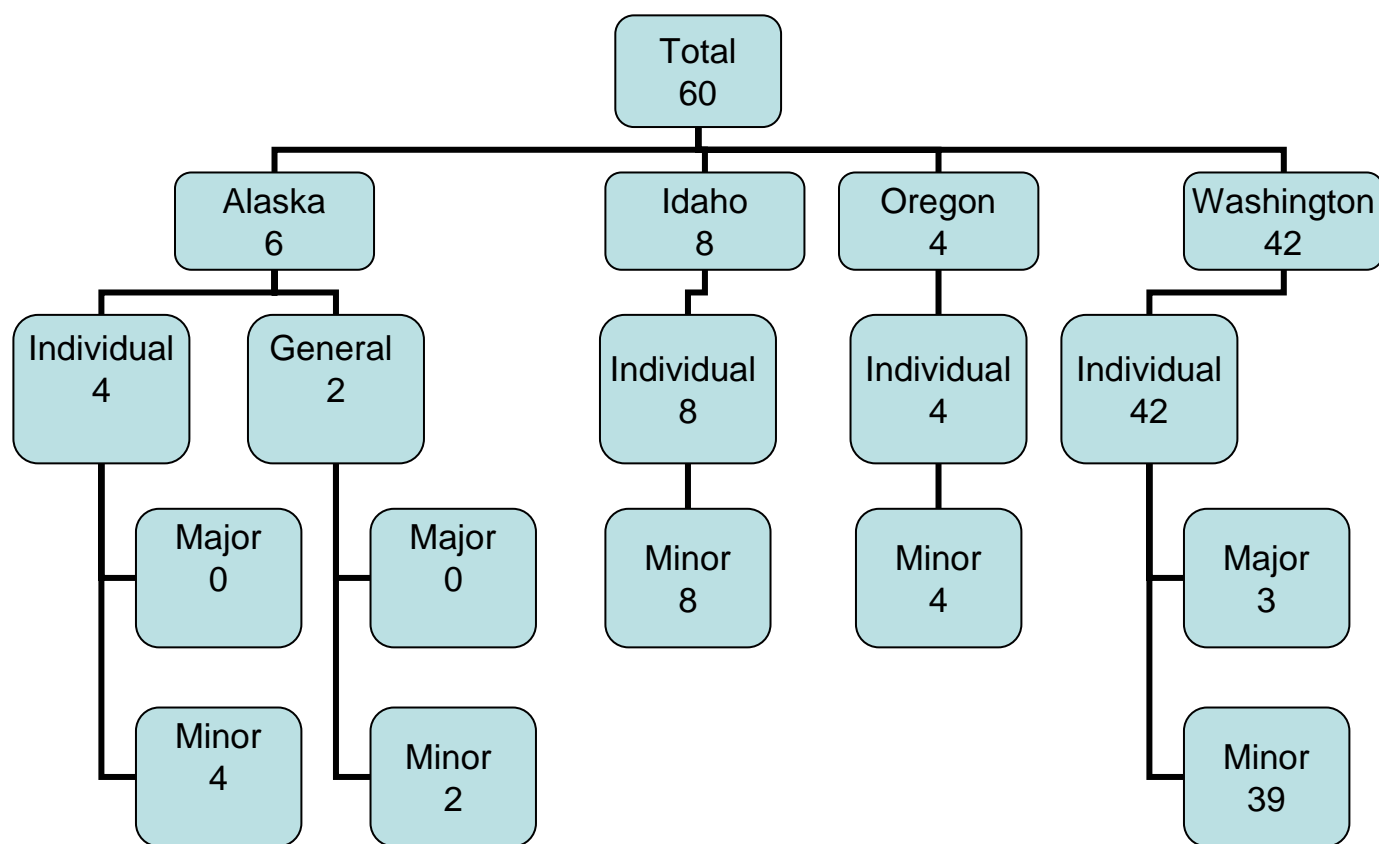
**Figure A-1. Facilities Under EPA Region 10's Permitting Authority**



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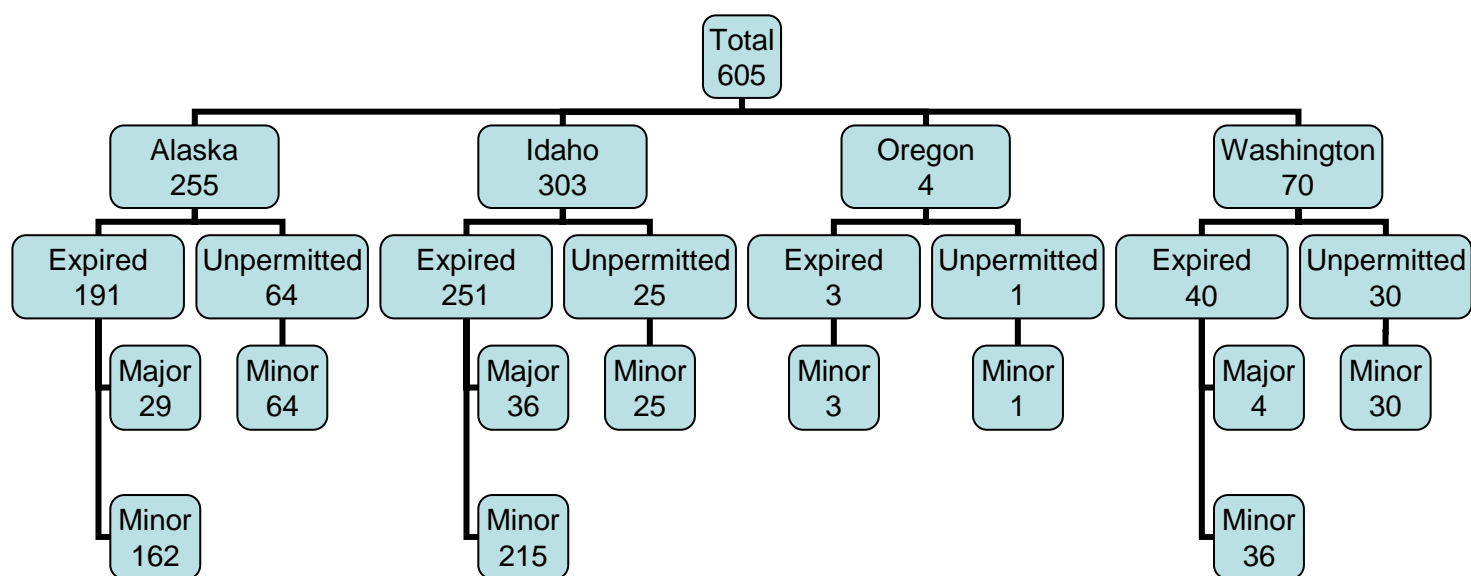
**Figure A-2. Tribal Facilities**



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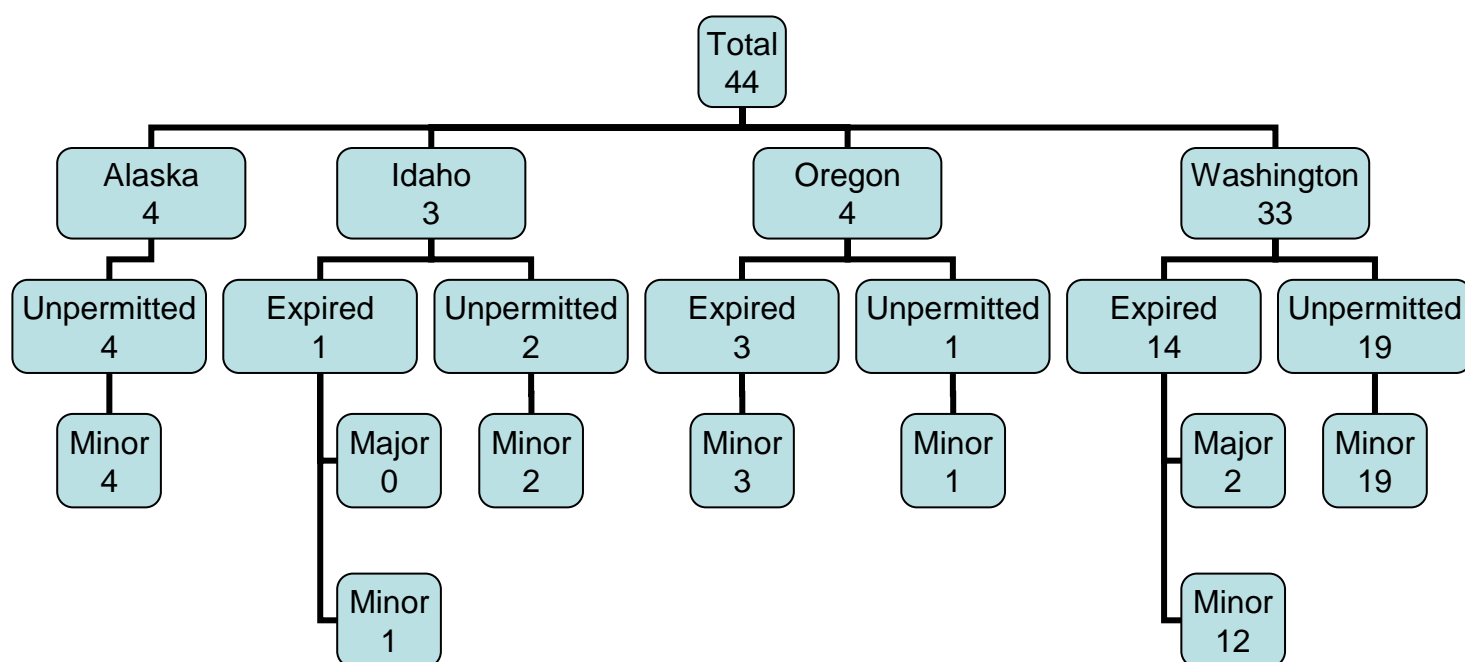
**Figure A-3. Backlogged Facilities Under EPA Region 10's Permitting Authority (as of 9/30/05)**



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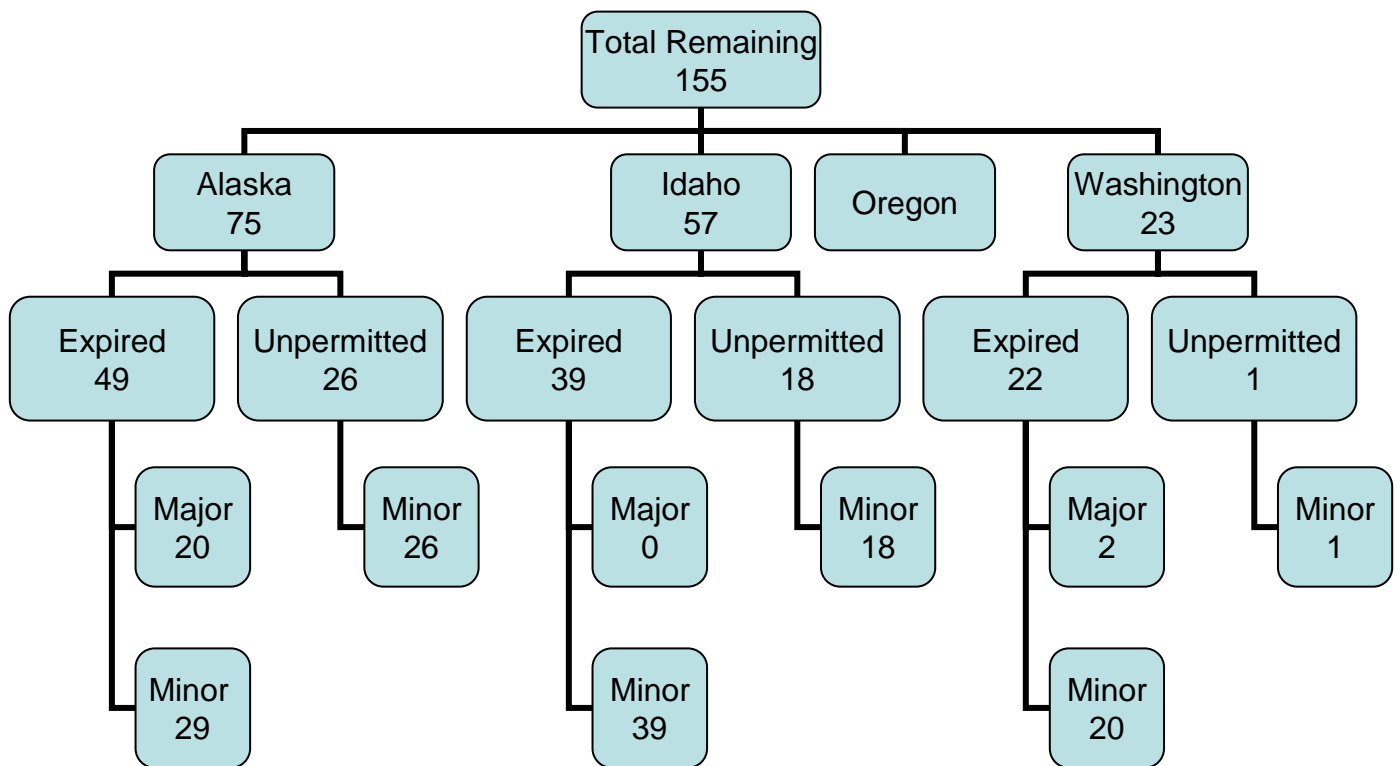
**Figure A-4. Backlogged Tribal Facilities Under EPA Region 10's Permitting Authority (as of 9/30/05)**



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### Permit Selection Process

**Figure A-5. Remaining Backlogged Facilities Under EPA Region 10's Permitting Authority projected for the End of CY of 2008**



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### Permit Selection Process

**Figure A-6. Remaining Backlogged Tribal Facilities Under EPA Region 10's Permitting Authority projected for the End of CY of 2008**

